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C.M. CONSTRUCTION
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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
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17 SAFECO INSURANCE COMPANY OF
18 AMERICA,

19 Plaintiff,

20 v.

21 LORI CHIANG, ROBERT CHIANG, and
22 CHIANG CM CONSTRUCTION
COMPANY, INC.,
23 Defendants.

CASE NO. C 04-1977 SC

**STIPULATION FOR ADR AND
CONTINUED CASE MANAGEMENT
CONFERENCE; ~~PROPOSED~~ ORDER**

Case Management Conference: Apr. 22, 2005
Time: 10:00 a.m.
The Honorable Samuel Conti

24 Plaintiff Safeco Insurance Company of America and Defendants Lori Chiang, Robert
25 Chiang, and Chiang C.M. Construction Company, Inc. previously stipulated to participate in
26 private mediation to be completed on or before April 30, 2005. The parties herein jointly request
27 that the parties be given an additional 90-day extension to complete mediation. The parties
28 request the extension in order to allow the parties to complete discovery in this matter and give

1 the parties an opportunity to work towards informal resolution of this matter without the need for
2 formal mediation or additional court intervention.

3 The parties also respectfully request that the status conference in this matter scheduled for
4 April 22, 2005 at 10:00 a.m. be continued to allow the parties to complete discovery and
5 mediation. The parties are permitted to file motions for summary judgment during the time that
6 the case is referred to mediation.

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8 DATED: April 11, 2005

SEDGWICK, DETERT, MORAN & ARNOLD LLP

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11 By: /s/ Mary C. Richardson

James P. Diwik

Mary Creer Richardson

Attorneys for Plaintiff

12 SAFECO INSURANCE COMPANY OF
13 AMERICA

14 SIGNATURE ATTESTATION: I, Mary Creer Richardson, counsel for plaintiff Safeco
15 Insurance Company of America, attest that concurrence in the filing of this document has been
16 obtained by Michele Miller, Esq., counsel for defendants as set forth above.

17 DATED: April 11, 2005

MCKAGUE AND TONG, LLP

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20 By: /s/ Michele Miller

Daron D. Tong

Michele Miller

Attorneys for Defendants

21 LORI CHIANG, ROBERT CHIANG & CHIANG
22 C.M. CONSTRUCTION
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PROPOSED ORDER

The parties shall complete mediation pursuant to the Stipulation.

The status conference in this matter scheduled for April 22, 2005 at 10:00 a.m. is hereby continued to 8/19, 2005. The parties are permitted to file motions for summary judgment during the time that the case is referred to mediation.

It is so ordered.

Dated: 4/13/05

/s/ Samuel Conti

Hon. Samuel Conti
U.S. District Court for the Northern District of
California